1 The Honorable Richard A. Jones 2 3 4 5 6 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 7 AT SEATTLE 8 9 10 UNITED STATES OF AMERICA, Case No.: CR 11-70 RAJ 11 Plaintiff, **DEFENDANT'S TRIAL BRIEF** 12 v. 13 TRIAL DATE: AUGUST 15, 2016 ROMAN SELEZNEV, 14 Defendant 15 16 Defendant Roman Seleznev raised all of the defense pretrial issues in his motions in limine. 17 Dkt. # 364. It does appear, however, that the Government's Trial Brief raises numerous new 18 issues not fully addressed by the defense in previous pleadings. See Dkt. # 370. 19 The defense will submit a response to the Government's Trial Brief along with the defense 20 responses to the Government's Motions in Limine to assist the Court in determining the position 21 of the parties prior to any hearing on these matters. 22 DATED this 25th day of July, 2016. 23 Respectfully submitted, 24 s/ John Henry Browne JOHN HENRY BROWNE, WSBA #4677 25 26 s/ Emma C. Scanlan EMMA C. SCANLAN, WSBA #37835 27 LAW OFFICES OF JOHN HENRY BROWNE, PS Attorneys for Roman Seleznev 28

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## **CERTIFICATE OF SERVICE**

I hereby certify that on July 25, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of filing to all registered parties.

<u>s/Emma C. Scanlan</u>

Emma C. Scanlan, WSBA #37835